

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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U.S. DISTRICT COURT
DISTRICT OF MASS

UNITED STATES OF AMERICA)
)
 v.)
)
 KENNETH WAGNER)

Cr. No. 03-10363-RWZ

**KENNETH WAGNER'S RESPONSE TO GOVERNMENT'S OPPOSITION AND
SUPPLEMENTAL MOTION FOR MODIFICATION
OF BAIL TERMS**

Now Comes defendant, Kenneth Wagner, who respectfully responds to the government's opposition to Mr. Wagner's request to modify his bail conditions. Defendant agrees, as he did during our last hearing, that the original motion was too vague. Therefore, he supplements his previous request to modify the terms of his bail as follows:

1. He would like to sell his home and get permission from this Court to move to Springfield, Missouri.
2. Mr. Wagner would like permission to place his home on the market in May 2004 with the hope of selling it within three months.
3. He would like permission from this Court to travel to Missouri in between now and August 2004 for the purpose of locating and purchasing a suitable home or renting an apartment in Springfield, Missouri. Mr. Wagner would agree to provide notice to Pre-Trial Services at least 48 hours in advance of any

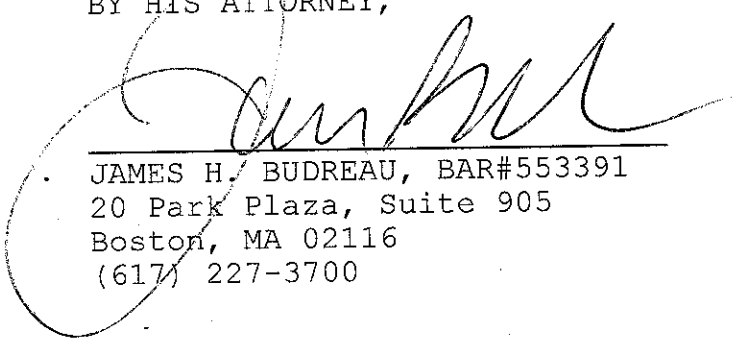
trip to Missouri along with his travel itinerary and places where he will stay during the trips.

4. Once Mr. Wagner has determined the location of his new residence, he agrees to provide Pre-trial Services at least 30 days advance notice of his plans to relocate and the location of his new residence.

5. Mr. Wagner agrees to continue to abide by all terms of his release and to the transfer of his Pre-Trial supervision to the Pre-Trial Services Office closest to his new home.

Wherefore, defendant moves this Court to grant his requests for modification of bail as outlined above.

Respectfully submitted,
BY HIS ATTORNEY,



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I hereby certify that a true and correct copy of the foregoing document was served by hand on the 25th day of March 2004 to Assistant U.S. Nadine Pellegrini.



James H. Budreau